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8EHQ-13- 19081

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April 24, 2013

Via Federal Express

United States Environmental Protection Agency - East
Attn: TSCA Section 8(e)
Room 6428
1201 Constitution Avenue, NW
Washington, DC 20004



Subject: Notice in Accordance with TSCA Section 8(e): Results of a fresh water algal growth inhibition test on *Desmodesmus subspicatus* with CAS No. 68647-95-0

Dear Section 8(e) Coordinator:

BASF Corporation is submitting results of a fresh water algal growth inhibition test on *Desmodesmus subspicatus* with Fatty acids, C18-unsaturated dimers, compounds with coco alkylamines, CAS No. 68647-95-0, conducted by BASF SE, Ludwigshafen, Germany. The test substance is a dispersant and grinding aid, an anti-settling and anti-floating agent for coatings, paints, printing inks, and other similar surface coatings, and a gelling aid for organically modified bentonite.

The median growth inhibiting concentration (ErC50/EyC50) and the low-effect concentrations (ErC10/EyC10, ErC20/EyC20), based on the average specific growth rate and the yield (algal biomass production) within 3 days, of the test substance to the green alga *Desmodesmus subspicatus*, were investigated over a period of 72 h.

Since the test substance is a multicomponent compound that is only partially soluble, the water accommodated fraction (WAF) approach (1) was used. A stock solution of 20 mg test substance was prepared in 10 mL tetrahydrofurane (THF). The test loadings were prepared by adding the respective amount of the THF stock solution to the individual test vessels. After complete evaporation of the solvent, 400 mL of the aerated algal medium were added, moderately stirred for 24 h, followed by filtration. The resulting water soluble fractions (WSF) (2) were used in the test. The loading rates of Fatty acids, C18-unsatd., dimers, compds. with coco alkylamine, were 0.10, 0.32, 1.0, 3.2 and 10 mg/L.

HPLC analyses of the test substance concentrations were conducted at the beginning, after 24 and 48 h, and at the end of the exposure (72 h). The analysis revealed that all test substance concentrations were below the quantification limit (LOQ=1 mg/L). Thus, the evaluation was based on the nominal loading rates.



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The results of the growth and yield inhibition of the test substance to green algae are summarized in the following table showing EC-values and 95% confidence limits (cl) with respect to the loading rates:

Parameter	ErC10	ErC20	ErC50
Value [mg/L]	0.091	0.156	0.393
Lower 95%-cl	0.054	0.109	0.328
Upper 95%-cl	0.127	0.200	0.472

Parameter	EyC10	EyC20	EyC50
Value [mg/L]	0.057	0.082	0.153
Lower 95%-cl	0.038	0.062	0.131
Upper 95%-cl	0.073	0.099	0.181

ErC: Effect concentrations based on growth rate, EyC: Effect concentrations based on yield

(1) Water accommodated fraction (WAF): The aqueous medium containing only the fraction of a multi-component test item that is dissolved and/or present as a stable dispersion /emulsion under test conditions in the test (OECD Guidance Document No. 23, 2000).

(2) Water soluble fraction (WSF): WSF consists of the component(s) of the WAF that is (are) in true solution (ECETOC Monograph No. 26, 1996)

BASF Corporation understands that reporting of the results from this study under TSCA 8(e) is in accordance with EPA's policy.

Please note the technical contact and address below and direct all correspondence regarding this submission accordingly. If you have any questions, please call (248) 948-2051.

Sincerely,

Technical Contact: Alisa Boucher

BASF Corporation
Product Regulatory Center of Expertise – North America
26701 Telegraph Road, Southfield, MI 48033

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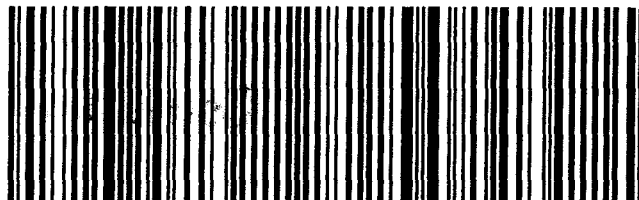
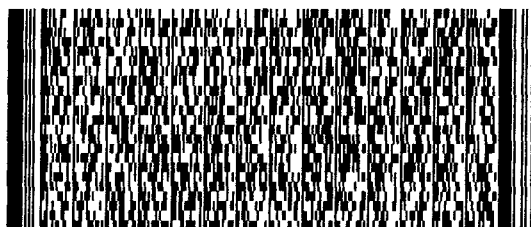
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